

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VISUAL SEMICONDUCTOR, INC.,

Appellant,

V.

STREAM TV NETWORKS, INC. *et al.*,

Debtors-in-Possess.

AND

WILLIAM A. HOMONY, *et al.*,

Trustees.

Civil No. 2:24-cv-06397-JMG

**APPELLEE’S DESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Federal Rule of Bankruptcy Procedure 8009, William A. Homony (the “Trustee”), in his capacity as Chapter 11 trustee of the bankruptcy estates of Stream TV Networks, Inc. (“Stream”) and Technovative Media, Inc. (“Technovative”) (when referred to with Stream, the “Debtors”), appellee in the appeal noticed by Visual Semiconductor, Inc. (“VSI” or the “Appellant”), on November 27, 2024 (the “Appeal”), files this Designation of Additional Items to be Included in the Record on Appeal (the “Designation”) in the above-captioned case and requests that the Clerk prepare and forward the items listed herein to the District Court for inclusion in the record in connection with the Appeal.

DESIGNATION

1. On June 6, 2024, the Court entered the Order Granting a Motion to Approve Compromise under Rule 9019 [D.I. 653]. On June 20, 2024, the Appellant filed a Motion to Reconsider the Order Granting a Motion to Approve Compromise under Rule 9019 [D.I. 686]. On November 14, 2024, the Court entered an Order Denying the Appellant's Motion to Reconsider [D.I. 805]. On December 11, 2024, the Appellant filed the Appellant's Statement of Issues and Designation of Items to be Included in the Record on Appeal [D.I. 883].

2. The Trustee respectfully designates the following additional items to be included in the appellate record pursuant to Bankruptcy Rule 8009:¹

Bankruptcy Docket Number	Date Entered in the Bankruptcy Docket	Brief Description of the Document or Transcript
548	1/5/2024	Memorandum Opinion Regarding Appointment of Chapter 11 Trustee
549	1/5/2024	Order Granting Motion to Appoint Chapter 11 Trustee
554	1/9/2024	Notice of Appointment of William A. Homony, CIRA as Chapter 11 Trustee
825	11/27/2024	Rembrandt's Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion Seeking (I) Enforcement of the Temporary Restraining Order, (II) Sanctions Against Parties Who Violated the Temporary Restraining Order, and (III) Injunctive Relief
826	11/27/2024	VSI's Motion to Reconsider and/or Clarify November 14, 2024, Order Quashing the Remaining VSI Discovery
827	11/27/2024	VSI's Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion to Reconsider and/or Clarify November 14, 2024, Order Quashing the Remaining VSI Discovery
832	11/29/2024	Trustee's Objection to Rembrandt's Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion Seeking (I)

¹ Unless otherwise indicated, all designated items include attached exhibits and declarations.

		Enforcement of the Temporary Restraining Order, (II) Sanctions Against Parties Who Violated the Temporary Restraining Order, and (III) Injunctive Relief
834	11/29/2024	Trustee's Objection to VSI's Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion to Reconsider and/or Clarify November 14, 2024, Order Quashing the Remaining VSI Discovery
835	11/29/2024	Trustee's Omnibus Response to VSI and Rembrandt's Objections to the Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
836	11/29/2024	Hawk's Joinder to Trustee's Omnibus Response to VSI and Rembrandt's Objections to the Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
837	11/30/2024	SeeCubic's Joinder to Trustee's Omnibus Response to VSI and Rembrandt's Objections to the Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
843	12/2/2024	Order Denying VSI's Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion to Reconsider and/or Clarify November 14, 2024, Order Quashing the Remaining VSI Discovery
844	12/2/2024	Order Denying Motion for Expedited Consideration, Shortened Time, and Limited

		Notice of Motion Seeking (I) Enforcement of the Temporary Restraining Order, (II) Sanctions Against Parties Who Violated the Temporary Restraining Order, and (III) Injunctive Relief
845	12/2/2024	Trustee's Notice of No Auction to be Held and Selection of Successful Bidder
850	12/3/2024	Trustee's Declaration in Support of Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
852	12/3/2024	J. Scott Victor's Declaration in Support of Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
876	12/9/2024	Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
878	12/11/2024 <i>Transcript Attached as Exhibit "A"</i>	Transcript of Hearing Held on December 4, 2024

ADVERSARY PROCEEDING (*In Re: Stream TV Networks, Inc. And Technovative Media, Inc. v. Shadron L. Stastney, et al.*, ADV. NO. 23-00057-MDC)

Bankruptcy Docket Number	Date Entered in the Bankruptcy Docket	Brief Description of the Document or Transcript
154	12/2/2024	Order Denying Motion for Expedited Consideration, Shortened Time, and Limited Notice of Motion Seeking (I) Enforcement of the Temporary Restraining Order, (II) Sanctions Against Parties Who Violated the Temporary Restraining Order, and (III) Injunctive Relief

RESERVATION OF RIGHTS

The Trustee expressly reserves his right to amend or supplement this Designation and/or to object, or otherwise supplement or move to strike or modify, some or all of any designation filed by any other party to this appeal. This filing is made expressly subject to and without waiver of any and all rights, remedies, challenges, and objections.

Respectfully submitted,

/s/ Michael D. Vagnoni

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Dated: December 26, 2024